

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

STANADYNE LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 23-10207 (TMH)

(Jointly Administered)

**NOTICE OF AMENDED²AGENDA OF MATTERS SCHEDULED
FOR HEARING ON AUGUST 22, 2023 AT 11:00 A.M. (ET)**

THE HEARING IS ADJOURNED TO AUGUST 31, 2023 at 2:00 P.M. (ET)

RESOLVED/ADJOURNED MATTERS

1. Debtors' Motion for Entry of: (A) an Order (I) Scheduling a Hearing on the Approval of the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, and the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (II) Approving Certain Bidding Procedures and Assumption and Assignment Procedures, and the Form and Manner of Notice Thereof, (III) Authorizing the Debtors to Enter into the Stalking Horse Purchase Agreement, and (IV) Granting Related Relief; and (B) an Order (I) Approving Asset Purchase Agreement, (II) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [D.I. 245, 4/27/23]

Response Deadlines: Sale Objection: June 21, 2023 at 4:00 p.m. (ET)

Cure Objections: June 12, 2023 at 5:00 p.m. (ET) (Initial Cure Notice); June 13, 2023 at 5:00 p.m. (ET) (Amended Cure Notice); July 6, 2023 at 5:00 p.m. (ET) (Supplemental Cure Notice)

Responses Received:

¹ The debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors' headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

² **Amended items are bolded.**

- A. Oracle's Limited Objection to and Reservation of Rights Regarding: (1) Debtors' Motion for Entry of: (A) an Order (I) Scheduling a Hearing on the Approval of the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, and the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (II) Approving Certain Bidding Procedures and Assumption and Assignment Procedures, and the Form and Manner of Notice Thereof, (III) Authorizing the Debtors to Enter into the Stalking Horse Purchase Agreement, and (IV) Granting Related Relief; and (B) an Order (I) Approving Asset Purchase Agreement, (II) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief; and (2) Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 346, 6/8/23]
- B. Objection of Navistar, Inc. to Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 358, 6/12/23]
- C. Objection of Caterpillar Reman Powertrain Indiana, LLC to the Cure Amount Proposed in the Debtors' Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 360, 6/12/23]
- D. Toyota Industries Commercial Finance, Inc.'s Objection to (1) Debtors' Motion for Entry of: (A) an Order (I) Scheduling a Hearing on the Approval of the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, and the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (II) Approving Certain Bidding Procedures and Assumption and Assignment Procedures, and the Form and Manner of Notice Thereof, (III) Authorizing the Debtors to Enter into the Stalking Horse Purchase Agreement, and (IV) Granting Related Relief; and (B) an Order (I) Approving Asset Purchase Agreement, (II) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other than Assumed Liabilities and Permitted Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief; and (2) Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 361, 6/12/23]
- E. Objection to Supplemental Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases With Reservation of Rights filed by Navistar [D.I. 409, 6/29/23]
- F. Objection of Caterpillar Reman Powertrain Indiana, LLC to the Supplemental Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 418, 7/5/22]

Related Documents:

- G. Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 297, 5/23/23]
- H. Notice of Amendment to Exhibit A to Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 306, 5/23/23]
- I. Supplemental Notice to Contract Parties to Potentially Assumed, Assigned, and Sold Executory Contracts and Unexpired Leases [D.I. 400, 6/26/23]
- J. Order (I) Approving Asset Purchase Agreement, (II) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [D.I. 443, 7/11/23]
- K. Notice of (I) Closing of Sale of Substantially All of the Debtors' Assets and (II) Filing of Schedules of Assigned Contracts and Excluded Assets [D.I. 484, 8/1/23]

Status: The responses listed as Items A, C, and D have been resolved. The responses listed as Items B, E, and F are adjourned.

- 2. Motion of Toyota Industries Commercial Finance, Inc. for Relief from Automatic Stay Due to Lack of Adequate Protection [D.I. 309, 5/26/23]

Response Deadline: July 3, 2023 at 4:00 p.m. (ET) (Extended to July 7, 2023 at 4:00 p.m. (ET) for the Debtors)

Related Documents:

- A. Certification of Counsel Regarding Proposed Order Approving Stipulation, Pursuant to Section 362 of the Bankruptcy Code Modifying the Automatic Stay for the Limited Purpose of Permitting Toyota Industries Commercial Finance, Inc. to Sell that Certain 2017 Bendi Forklift Model B30AC-DS-1705G-10366 [D.I. 468, 7/24/23]
- B. Order Approving Stipulation, Pursuant to Section 362 of the Bankruptcy Code Modifying the Automatic Stay for the Limited Purpose of Permitting Toyota Industries Commercial Finance, Inc. to Sell that Certain 2017 Bendi Forklift Model B30AC-DS-1705G-10366 [D.I. 472, 7/25/23]

Status: This matter is resolved.

- 3. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Jones Lang LaSalle Americas, Inc. as Broker for the Debtors and Debtors in Possession with Respect to the Windsor Property, Effective as of May 25, 2023, and Waiver of Information Requirements Imposed by Local Rule 2016-2(d) and (h) [D.I. 383, 6/20/23]

Response Deadline: July 5, 2023 at 4:00 p.m. [ET]

Responses Received: None.

Related Documents:

- A. Certificate of No Objection [D.I. 438, 7/10/23]
- B. Order Authorizing the Retention and Employment of Jones Lang LaSalle Americas, Inc. as Broker for the Debtors and Debtors in Possession with Respect to the Windsor Property, Effective as of May 25, 2023, and Waiver of Information Requirements Imposed by Local Rule 2016-2(d) and (h) [D.I. 439, 7/10/23]

Status: The order has been entered. No hearing is necessary.

- 4. Debtors' Motion for an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Further Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 483, 7/28/23]

Response Deadline: August 11, 2023 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Certificate of No Objection
- B. Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Further Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 504, 8/15/23]

Status: The order has been entered. No hearing is necessary.

- 5. Debtors' Second Motion for an Order Pursuant to Bankruptcy Rules 9006 and 9027, Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [D.I. 494, 8/8/23]

Response Deadline: August 11, 2023 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Certificate of No Objection [D.I. 507, 8/16/23]
- B. Order, Pursuant to Bankruptcy Rules 9006 and 9027, Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [D.I. 509, 8/17/23]

Status: The Order has been entered. No hearing is necessary.

6. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Abandon or, Alternatively Sell the Windsor Property and (II) for Related Relief [[D.I. 486](#), 8/2/23]

Response Deadline: August 15, 2023 at 4:00 p.m. (ET) (Extended to August 17, 2023 at 4:00 pm (ET) for the CT Office of the Attorney General and Town of Windsor)

Responses Received:

- A. Objection of the Connecticut Department of Energy and Environmental Protection to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Abandon or, Alternatively Sell the Windsor Property and (II) for Related Relief [[D.I. 513](#), 8/17/23]
- B. Objection of the Town of Windsor to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Abandon or, Alternatively Sell the Windsor Property and (II) for Related Relief [[D.I. 516](#), 8/17/23]

Additional Documents:

- C. Response of Stanadyne Operating Company LLC to Objection of the Town of Windsor to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Abandon or, Alternatively Sell the Windsor Property and (II) for Related Relief [[D.I. 520](#), 8/18/23]
- D. Declaration of Bradley I. Dietz in Support of the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Abandon or, Alternatively Sell the Windsor Property and (II) for Related Relief [[D.I. 523](#), 8/21/23]

Status: **This matter is adjourned to August 31, 2023 at 2:00 p.m. (ET).**

Dated: August 21, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Ashley E. Jacobs

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